

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:18-CR-452-1-FL

UNITED STATES OF AMERICA,

v.

LEONID ISAAKOVICH TEYF,

Defendant.

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**MOTION TO SEAL**

Leonid I. Teyf, by and through counsel, hereby requests the motion and incorporated memorandum filed at Doc. No. 111, be sealed until ordered unsealed by the Court so that information contained therein will not be made public.

Leonid I. Teyf, by and through counsel, hereby moves for an order requiring the Government to serve a particular individual with its Motion for Protective Order (Doc. No. 111) and establish a revised briefing schedule so that this individual may retain counsel and respond to a motion with profound negative consequences for that individual both personally and professionally. Similar to the Motion filed at DE #104 and sealed pursuant to DE #107, the proposed sealed motion discusses assertions made about the activities of an individual not charged with a criminal offense. Disclosure of such assertions to the public at this stage might cause prejudice or treatment of that individual. Such concerns overcome any common law or First Amendment presumption to access.

Wherefore, counsel for Mr. Teyf respectfully prays for the sealing of the motion filed at Doc. No. 111 until such time as counsel requests it to be unsealed. The undersigned also requests that the Clerk of Court be directed to provide the parties with filed copies of the Motion.

This the 29<sup>th</sup> day of January, 2019.

/s/ James P. McLoughlin, Jr.  
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## CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I also served a copy of the foregoing upon counsel for the United States in this action by sending a copy to each counsel by electronic communication as referenced below:

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